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X CORP. AS SUCCESSOR IN
INTEREST TO TWITTER, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAROLINA BERNAL STRIFLING,
WILLOW WREN TURKAL, and SYDNEY
FREDERICK-OSBORNE on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

TWITTER, INC. and X CORP.,

Defendants.

Case No. 4:22-cv-07739-JST

JOINT STIPULATION AND
[PROPOSED] ORDER TO STAY CASE
PENDING MEDIATION

Pursuant to Civil Local Rule 6-2, Plaintiffs Carolina Bernal Striffling, Willow Wren Turkal, and Sydney Frederick-Osborne (“Plaintiffs”) and Defendant X Corp., on its own behalf and as successor in interest to Defendant Twitter, Inc. (hereinafter “Defendant”) (Plaintiffs and Defendant shall collectively be referred to as the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on August 24, 2023, the Court in the matter entitled *Eitan Adler v. Twitter, Inc. and X Corp.*, Case No. 3:23-cv-01788-JD (N.D. Cal.) ordered the parties to mediate the plaintiff’s claims, and the parties have scheduled such mediation to take place on December 1–2, 2023;

WHEREAS, counsel for the Parties have conferred and agreed that the interests of preserving judicial economy and the Parties’ collective time and resources would be best served by including the pending Action within the scope of mediation ordered by the federal court in *Adler*.

WHEREAS, in service of judicial economy counsel for the Parties have conferred and agreed to request a temporary stay of this Action, including all currently pending deadlines, briefing schedules, court conferences, motion hearings and Court decisions through January 2, 2024, given that mediation will occur in December;

WHEREAS, the Parties have conferred and specifically request that the Court defer ruling on Defendant’s pending Motion to Strike Portions of the First Amended Complaint, which is currently under submission with the Court, until January 2, 2024 or later.

NOW, THEREFORE, the Parties stipulate to the following, subject to the Court’s approval:

1. This Action shall be stayed through January 2, 2024;
2. All pending pre-trial and discovery-related deadlines shall be continued to dates after January 2, 2024;
3. The Court shall defer ruling on Defendant’s pending Motion to Strike Portions of the First Amended Complaint until January 2, 2024 or later; and
4. The Parties shall report to the Court the status of settlement discussions by January

2, 2024, and indicate their position as to whether the stay should be continued or lifted.

IT IS SO STIPULATED.

Respectfully submitted,
CAROLINA BERNAL STRIFLING, WILLOW
WREN TURKAL, and SYDNEY FREDERICK-
OSBORNE, on behalf of themselves and all others
similarly situated,

By their attorneys,

/s/ Shannon Liss-Riordan

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Respectfully submitted,
X CORP. as successor in interest to
TWITTER, INC.

By their attorneys,

/s/ Eric Meckley

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Dated: September 15, 2023

[PROPOSED] ORDER

Pursuant to the Parties' Stipulation and for GOOD CAUSE appearing, the Court hereby orders that, to allow the Parties to mediate the claims in this Action:

1. This Action shall be stayed through January 2, 2024.
2. All pending pre-trial and discovery-related deadlines shall be continued to dates after January 2, 2024.
3. The Court shall defer ruling on Defendant's pending Motion to Strike Portions of the First Amended Complaint until January 2, 2024 or later.
4. The Parties shall submit a joint status report no later than January 2, 2024 regarding the status of settlement discussions and indicate their position as to whether the stay should be continued or lifted.

Dated: _____

Honorable Jon S. Tigar
District Court Judge